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15 UNITED STATES DISTRICT COURT
16
17 NORTHERN DISTRICT OF CALIFORNIA
18 OAKLAND DIVISION

19 In re RIPPLE LABS INC. LITIGATION

) Case No. 4:18-cv-06753-PJH
)

20 This Document Relates To:
21
22 ALL ACTIONS.

) CLASS ACTION
)

) DECLARATION OF STEPHEN J. ODDO IN
) SUPPORT OF REPLY MEMORANDUM IN
) FURTHER SUPPORT OF PLAINTIFFS'
) MOTION TO REMAND
)

) DATE: February 13, 2019

) TIME: 9:00 a.m.

) CTRM: 3, 3rd Floor

) JUDGE: Hon. Phyllis J. Hamilton
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1 I, STEPHEN J. ODDO, declare as follows:

2 I am a partner with the law firm Robbins Arroyo LLP, one of the counsel of record for
3 plaintiffs Vladi Zakinov and David Oconer in the above-captioned action. I am a member in good
4 standing of the Bar of the State of California. I submit this declaration in support of Plaintiffs' Reply
5 Memorandum in Further Support of Plaintiffs' Motion to Remand. I have personal knowledge of the
6 matters stated herein and, if called upon, I could and would competently testify thereto.

7 Attached hereto are true and correct copies of the following documents:

8 Exhibit A: *Savadians v. Toledo, et al.*, Case No. HG09447714, Case Management Order
9 (Alameda Super. Ct. Dec. 9, 2009);

10 Exhibit B: *Bryant v. Matson Navigation Co., et al.*, Case No. RG07361995, Case
11 Management Order (Alameda Super. Ct. Nov. 6, 2008);

12 Exhibit C: *Taylor v. Belen*, Case No. HG06261686, Order Overruling Defendant's
13 Demurrer and Consolidating Action (Alameda Super. Ct. June 15, 2006);

14 Exhibit D: *Johnson v. Vowell, et al.*, Case No. CGC-03-421113, Order Denying Motion
15 to Dismiss (San Francisco Super. Ct. Nov. 24, 2003); and

16 Exhibit E: *In re Ripple Labs Inc. Litigation*, Lead Case No. 18-CIV-02845, Notice of
17 Related Case (San Mateo Super. Ct. Oct. 25, 2018).

18 I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th
19 day of January, 2019, at San Diego, California.

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21 /S/ Stephen J. Oddo

22 STEPHEN J. ODDO

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CERTIFICATE OF SERVICE

I hereby certify that on, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 25, 2019.

/s/ Stephen J. Oddo
STEPHEN J. ODDO